

Main Corruption Fighting regulations applicable to Safran (non exhaustive)

The Safran anti-corruption program covers the entire set of requirements from the following international conventions:

- (i) the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997);
- (ii) the European conventions on anti-corruption: The European Community Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union (1997), the Council of Europe Criminal Law Convention on Corruption, against the active and passive corruption of foreign officials (1999), the Council of Europe Civil Law Convention on Corruption (1999);
- (iii) the United Nations Convention against Transnational Organized Crime, signed in Palermo (Italy, 2000);
- (iv) the United Nations Convention against Corruption, referred to as the “Merida” Convention or “UNCAC” (2003).

The same goes wherever the Group operates, where it must uphold any applicable law and regulation, such as:

- (i) **French law:**
 - Law no. 2000-595 of June 30, 2000, amended by law no. 2007-1598 of November 13, 2007, on combating corruption, private or public, active or passive; and
 - Law n°2013-1117 of December 6, 2013 on combating tax fraud and serious economic and financial crime, and
 - law 2016-1691 on “transparency, fight against corruption and modernization of economic life, also called “Sapin II” entered into force on December 11, 2016”.
- (ii) **American Law:** the “Foreign Corrupt Practices Act” (FCPA - 1977). In 1998, when the USA ratified the OECD Convention, it was renamed the “International Anti-bribery and Fair Competition Act”;
- (iii) **United Kingdom Law:** the UK “Bribery Act” (2010).

Safran's anti-corruption program goes beyond legal requirements to comply with guidelines designed to promote and step up integrity practices, as defined by:

- (i) the 10th principle on combating corruption of the **United Nations Global Compact**;
- (ii) **GIFAS** (Groupement des Industries Françaises Aéronautiques et Spatiales);
- (iii) the **Common Industry Standards (CIS)** defined by the Aerospace and Defence Industries Association of Europe - **ASD**;
- (iv) the "**ICC**" (**International Chamber of Commerce**) rules on corporate social responsibility and the fight against corruption;
- (v) the United States Department of Justice ("DOJ") Guidance on the "Evaluation of Corporate Compliance Programs" (the "Compliance Evaluation Guidance");
- (vi) the ISO 37001 requirements, issued in October 2016.

Update : 26/01/2018